Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Promotion of Competitive Networks in Local Telecommunications Markets	)	WT Docket No. 99-217
	)	
Wireless Communications Association International, Inc. Petition for Rulemaking to Amend Section 1.4000 of the Commission's Rules to Preempt Restrictions on Subscriber Premises Reception or Transmission Antennas Designed to Provide Fixed Wireless Services	)	
	)	
Cellular Telecommunications Industry Association Petition for Rule Making and Amendment of the Commission's Rules to Preempt State and Local Imposition of Discriminatory And/Or Excessive Taxes and Assessments	)	
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act Of 1996	)	CC Docket No. 96-98

COMMENTS OF THE COLORADO MUNICIPAL LEAGUE, THE GREATER METRO TELECOMMUNICATIONS CONSORTIUM, COLORADO SPRINGS UTILITIES , AND THE CITY OF COLORADO SPRINGS IN RESPONSE TO NOTICE OF INQUIRY, WT DOCKET NO. 99-217

Kenneth S. Fellman, Esq.
Kissinger & Fellman, P.C.
3773 Cherry Creek N. Dr., Suite 900
Denver, Colorado 80209
Attorneys for GREATER METRO TELECOMMUNICATIONS CONSORTIUM

Geoffrey T. Wilson, Esq.
General Counsel
Colorado Municipal League
1144 Sherman Street
Denver, Colorado 80203
Attorney for COLORADO MUNICIPAL LEAGUE

Debra Geibig, Esq.
Anderson, Dude & Lebel, P.C.
104 S. Cascade Ave., #204
Colorado Springs, CO 80903
Attorneys for COLORADO SPRINGS UTILITIES and Special Counsel for the CITY OF COLORADO SPRINGS

October 11, 1999

TABLE OF CONTENTS

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Promotion of Competitive Networks in Local Telecommunications Markets	)	WT Docket No. 99-217
	)	
Wireless Communications Association International, Inc. Petition for Rulemaking to Amend Section 1.4000 of the Commission's Rules to Preempt Restrictions on Subscriber Premises Reception or Transmission Antennas Designed to Provide Fixed Wireless Services	)	
	)	
Cellular Telecommunications Industry Association Petition for Rule Making and Amendment of the Commission's Rules to Preempt State and Local Imposition of Discriminatory And/Or Excessive Taxes and Assessments	)	
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act Of 1996	)	CC Docket No. 96-98
	)	

COMMENTS OF THE COLORADO MUNICIPAL LEAGUE, THE GREATER METRO TELECOMMUNICATIONS CONSORTIUM, COLORADO SPRINGS UTILITIES , AND THE CITY OF COLORADO SPRINGS IN RESPONSE TO NOTICE OF INQUIRY, WT DOCKET NO. 99-217

I. INTRODUCTION

The Colorado Municipal League ("the League"), the Greater Metro Telecommunications Consortium ("GMTC"), Colorado Springs Utilities, an enterprise of the City of Colorado Springs, and the City of Colorado Springs, by and through their attorneys, submit these Comments in the above-captioned proceeding pursuant to the amended schedule set forth by the Commission.

A. The Commenters

The Colorado Municipal League is a voluntary association of municipal governments created in 1924. Two hundred and sixty-three of Colorado's 269 incorporated municipalities belong to the League, comprising 99.67% of the State's municipal population. The League provides a wide array of services to its members, including advocacy before state and federal regulatory, legislative and appellate judicial fora.

The Greater Metro Telecommunications Consortium is an agency created by intergovernmental agreement pursuant to Colorado statute. Members of the GMTC are 25 municipalities and counties within the Denver metropolitan area. A complete list of the GMTC members is attached as Exhibit A. GMTC members address telecommunications issues affecting their jurisdictions on a regional, cooperative basis wherever possible.

The City of Colorado Springs is the second largest City in Colorado with a population of approximately one-half million and is located on the Front Range approximately 60 miles south of Denver. Colorado Springs Utilities is an enterprise of the City of Colorado Springs and provides electric, gas, water and waste water utilities to its resident customers. It manages its utility rights-of-way independently from the City of Colorado Springs' management of street rights-of-way.

B. Overview

In the NOI, at paragraph 79, the Commission states, ". . . we note that several States have enacted guidelines to govern the requirements that local governments may impose on telecommunications rights-of-way users. We seek comment on the success or failure of these efforts." These comments specifically address the history and passage of Senate Bill 96-10 by the Colorado General Assembly in 1996 (codified at C.R.S. §38-5.5-101. *et seq.*), the legislation's

restriction on municipal authority to regulate telecommunications providers' use of public rights-of-way, various local governments' right-of-way management policies and ordinances both prior to and subsequent to passage of Senate Bill 96-10, and the law's effect on the construction of competitive networks in Colorado communities.

II. COLORADO'S SENATE BILL 96-10

A. Legislative History

Prior to the 1996 session of the Colorado General Assembly, several Colorado telecommunications providers decided that it would be good for business if they could avoid local franchising requirements and, in particular, obtain free use of public rights-of-way. So these companies secured introduction of a bill, designated Senate Bill (SB) 96-10, in the 1996 legislative session.

The regional Bell operating company, US West, and the major new entrants in the Colorado local exchange market have agreed on little before or since SB 96-10. They all did agree, however, that free use of the public streets, along with relief from any local franchising obligation, would be a very good deal indeed, and worked together to pass SB 96-10.

SB 96-10, which is codified at 38-5.5-101 C.R.S. *et. seq.*, was signed into law April 12, 1996. The significant elements of the bill in terms of right-of-way management, are its provisions preserving municipal police powers, 38-5.5-101(2) C.R.S., and fee authority relating to street construction permits, 38-5.5-107(1)(a)(II) C.R.S., while purporting to eliminate municipal authority to require franchises, 38-5.5-101(2)(b) C.R.S. or payment of any franchise fee or rental for private corporate use of the public streets, 38-5.5-107(1) C.R.S. Not surprisingly, SB 96-10 has been trumpeted around the country as ideal state legislation by the industry.

SB 96-10 was not, of course, presented to the Colorado General Assembly as a device to enable telecommunication companies to avoid franchising and obtain rent-free use of public property. Instead, the bill's proponents earnestly explained that, actually, the legislation was critical to the rapid development of competition in Colorado's local exchange market. Requiring the companies to obtain local franchises would slow down their ability to develop "ubiquitous, seamless, statewide telecommunication networks", 38-5.5-101(1)(b) C.R.S. As the law declares: "[t]o require telecommunications companies to seek authority from every political subdivision within the state to conduct business is unreasonable, impractical, and unduly burdensome." *Id.* Support for the provision in SB 96-10 that use of the streets would be rent-free (as well as franchise-free) was explained as borne of a strong desire to save consumers money. After all, the argument went, if municipalities can charge fees for right-of-way use, this will just be passed along to consumers in the form of higher rates. Obviously, the only way to prevent this terrible disservice to consumers was to give these private corporations rent-free use of the public's property.

B. SB 96-10: Three Years Later

It has now been over three years since SB 96-10 became law. During that time, the industry has had franchise and rent-free access to public rights-of-way in Colorado. In SB 96-10, thanks to a cooperative state legislature, the industry "had its way" with Colorado municipalities, getting virtually everything it wanted in the way of removal of local right-of-way controls. After listening to the sales pitch on SB 96-10, one would reasonably expect development of competition in the Colorado local exchange market to be substantially ahead of that experienced in other states, where local franchises are still "holding back" competition.

Of course, this hasn't happened. US West and its competitors continue to squabble incessantly and can agree on virtually nothing, a situation that the chairman of the General Assembly's present Interim Committee on Telecommunications recently likened to a playground fight. While the finger-pointing drones on and on and on, most Colorado residential and business local exchange customers try to make due with local phone service provided by a huge, unresponsive, defacto monopoly provider.[1] Competitive options are primarily available only to "cherry-picked" business customers in certain high traffic, high profit areas, such as the Denver central business district and the Denver Technological Center, in the southeast Denver metro area. In other words, Colorado is just like most other states.

Two recent news accounts of the customer service problems and lack of competition for local telephone service are attached as Exhibits C and D. These articles are not submitted to direct blame toward one segment of the industry as opposed to another. They simply illustrate the transparent nature of the industry promises of competition, if only local governments were stripped of their rights to franchise telecommunications providers.

III. LOCAL GOVERNMENT RIGHTS-OF-WAY REGULATIONS

A review of the rights-of-way ordinances among GMTC members suggests a wide range of regulatory oversight. Local regulations governing rights-of-way occupation and use are virtually non-existent in some communities and fairly heavily regulated in others. As Senate Bill 96-10 prohibits the recovery of franchise fees or rights-of-way rental fees, local government regulation is

---

[1] This fact is well illustrated by the FCC's own annual report on competition in the local exchange market, the pertinent excerpt of which is attached as Exhibit B. The FCC report shows that Colorado's regional Bell operating company, US West, while providing 2,637,103 lines to end users in Colorado, has provided a mere 30,023 lines to its competitors for resale. (See lines I.A.1. and I.B.8., respectively.)

limited to matters such as permitting processes to identify work performed in the rights-of-way, mapping of infrastructure located in the rights-of-way, insurance and indemnification, and obligations to repair street cuts to certain standards.

A number of GMTC communities have rights-of-way regulations which have not been amended in many years. For example, Commerce City, located north and east of Denver, has not changed its City Code regulating excavation and permits for work in public rights-of-way since 1969. The Code contains fairly straightforward requirements for limiting the time that work in the rights-of-way can be done, placing of protective barricades, restoration of property to City standards, posting bonds, and providing insurance. Interestingly, the maximum bond required is $10,000.00, and the maximum amount of insurance required is $300,000.00 for bodily injury and $50,000.00 aggregate property damage. These figures are substantially below the cost that would likely be incurred if it were necessary to execute on the bond, or utilize the insurance. A copy of the Ordinance is attached as Exhibit E.

The City of Cherry Hills Village, a residential community located south of Denver, has not updated its street excavation ordinances since 1980. Cherry Hills requires an excavation permit fee of $20.00 per street cut for excavations up to 20 feet in length, plus $10.00 for each additional 20 feet. A bond is required equal to $2.00 per each linear foot of cut, or $1,000.00, whichever is greater. Again, the fees charged are substantially below the actual cost of repair, and do not begin to address the issue of additional maintenance that local taxpayers must incur, to resurface streets that have undergone multiple cuts over a period of time. The Cherry Hills ordinance is attached as Exhibit F.

The City of Englewood, another first ring suburb located south of Denver, adopted "fiber optic cable regulations" in 1987, and amended in 1994. Rights-of-way users must obtain permits to work in the right-of-way, provide accurate maps of their facilities to the City, provide metallic tracer with underground warning tape for all underground installations, provide adequate horizontal clearance with existing and proposed utilities that must share the right-of-way, and assume all liability to persons or property as a result of their facilities in the right-of-way. The Englewood regulations are attached as Exhibit G.

The City of Wheat Ridge, located west of Denver, requires permits with fees set by Council resolution. Currently fees range from $.10 per lineal foot for sidewalks to $.30 per square foot for street cuts, plus a basic permit fee of $75.00. To reflect increased costs when cutting streets during periods of cold weather, fees are doubled between November 1st and March 15th. A letter of credit in the amount of the estimated cost of the work must be filed, and repairs to City standards must be guaranteed for two years. A hearing process is available for any entity that disputes the necessity of City - directed repairs. The Wheat Ridge ordinance is attached as Exhibit H.

The City of Lakewood is the largest suburb of metro Denver. Lakewood's ordinance, unchanged since 1982, requires $10.00 permit fees for individual permits, and $100.00 fees for annual permits. The ordinance requires cash or a letter of credit in an amount equal to the estimated cost of the restoration for individual permits; cash or a letter of credit for $10,000.00 for an annual permit; and provides an exception for public utilities, which can provide a letter of guaranty in lieu of the letter of credit. The Lakewood ordinance is attached as Exhibit I.

The City of Glendale is a small enclave community that is surrounded on all sides by Denver. Glendale has no written right-of-way excavation or permit requirements. According to the City's

Public Works Director, he only wants to know "who's doing the digging, where they're doing it, and are they insured?"

The City of Colorado Springs' occupancy ordinance is substantially similar to the ordinance as adopted in 1968. It imposes a $10.00 initial permit fee, automatic annual renewal for a $1.00 fee with evidence of liability insurance policies in the amount of $300,000.00 for bodily injury and $100,000.00 for property damage. Prior to 1999, the City absorbed administrative fees associated with construction and occupancy permits estimated in excess of $500,000. In 1999, the City of Colorado Springs modified its construction fee schedule to attempt to recover a greater portion of administrative costs associated with construction and occupancy permits. The modified fee remains modest: only $200.00 for excavations exceeding 500 feet. The Occupancy Ordinance and Construction Fee schedule is attached as Exhibit J. The City spends approximately $1,000,000.00 a year in street maintenance and capital costs associated with street cuts by telecommunications providers and for other purposes. These costs are not recovered at this time. Only a portion of the administrative expenses associated with the excavation permits will be recovered by the new excavation permit fee.

Colorado Springs Utilities manages its utilities rights-of-way independently of the City of Colorado Springs. The process for obtaining a permit to occupy Utility rights-of-way is similar to that of the City's with the same issuance and renewal fees. In addition, the Utilities requires reimbursement for administrative expenses which are estimated in advance to the provider. Recoverable administrative expenses include the time necessary for an engineering review of the proposed occupancy and attachments to CSU facilities. Over the course of the last few years,

approximately 10 permits have been issued to telecommunications providers. None have objected to the charges imposed to recover administrative expenses.

IV. DENVER'S RIGHT-OF-WAY ORDINANCE

In 1997, the City and County of Denver adopted Ordinance 628, to address right-of-way management policies in light of the expected competition to be faced as a result of the passage of The Telecommunications Act of 1996. Ordinance 628 was intended to protect Denver citizens from subsidizing telecommunications companies by establishing a permit process with fees calculated to cover the fair value of the City's costs in acquiring and maintaining public rights-of-way. The Ordinance requires permit fees based on a per lineal foot charge for facilities already in the rights-of-way, as well as construction of new facilities. As with ordinances from other communities, Ordinance 628 also requires insurance and bonding, work performance guarantees, repair of damage to property, and provision of as built maps to the City of all facilities a company has located in public rights-of-way. The ordinance is attached as Exhibit K.

Denver believes its ordinance addresses issues solely within the scope of the City's local police powers. Industry representatives believe that the ordinance pushed the regulatory envelope past that which was permitted by SB 96-10, and filed suit in Denver District Court challenging the validity of the ordinance on a number of grounds. In March, 1999, the Denver District Court found that the ordinance was both unconstitutional under State law, and preempted by Senate Bill 96-10. *U.S. West Communications, Inc., et al. v. City and County of Denver*, Denver District Court, State of Colorado, Case No. 98CV691 (Consolidating Case Nos. 98CV691, 98CV737, 98CV873, and 98CV2006). The case is currently on appeal to the Colorado Supreme Court, *City and County of*

Denver v. U.S. West Communications, Inc., et al, Supreme Court, State of Colorado, Case No. 99SA219

Despite the strict regulatory framework of Denver's Ordinance 628, there have actually been far more applications for rights-of-way permits in the brief period of time since the passage of that ordinance, than in the 14 years prior to the ordinance passage. Attached as Exhibit L is a September 2, 1999 memorandum prepared for Dean Smits, the Director of Denver's Office of Telecommunications. Between 1983 and December 1997, eleven revocable permits were awarded to telecommunication providers in Denver. Between January, 1998 and July, 1999, twelve applications and/or Notices of Intent to apply for private use permits (the name of the permits under Ordinance 628) were received by the City.

V. CONCLUSION

The Colorado General Assembly accepted the argument of the telecommunications industry, i.e., that without preemption of local franchising authority for the use of public rights-of-way, competitive networks would not occur and prices would not remain competitive, because franchising costs would necessarily be passed through to subscribers of the new services. One would expect therefore, that competitive services would now be thriving in Colorado, and that Colorado subscribers to these services would be paying less than consumers in other states which allow local franchising. Nothing could be further from the truth.

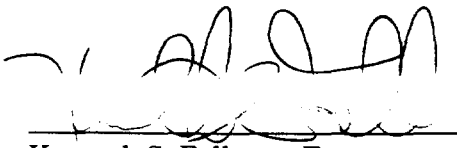
No Colorado community can require a franchise from telecommunications providers, nor can franchise fees be charged. Those communities that have little or no regulatory framework, and very limited obligations as far as the cost of the permitting process, have actually seen less competition than the larger communities with the heavy concentration of business users, even though those larger

communities have more extensive regulatory frameworks. Indeed, the one community which has the most comprehensive regulatory framework -- one which was challenged and found (by a state District Court) to be unconstitutional and preempted by Senate Bill 96-10, is the one community which has seen the most activity in the construction of competitive networks.

This evidence indicates quite clearly that local government regulations of the use of public rights-of-way play little to no role in the construction of competitive networks. If, as the industry suggests, local regulations are a burden on competition, one should expect the lack of regulations to be a boon for competition. The facts prove otherwise – the competitive networks will go where the heaviest concentration of volume and market share lies, regardless of the regulatory framework at the local level. Moreover, consumer prices are not substantially impacted by the local regulatory structure. Regardless of the existence of local regulations, charges for new services will be set at whatever price the market will bear.

The bottom line is that SB 96-10 has not done a thing to spur competition in Colorado and has not resulted in lower prices for Colorado consumers. What SB 96-10 has done is accomplish its original actual purpose -- it has given the telecommunications companies rent-free use of the public's property for purposes of private corporate gain. This has doubtless been good for company shareholders; it has done nothing for Colorado consumers.

Based upon the evidence in Colorado, there is no reason for the Commission to proceed any further with proceedings leading to any restriction of local government authority over rights of way with respect to the build out of competitive telecommunications networks.



Kenneth S. Fellman, Esq.
Kissinger & Fellman, P.C.
3773 Cherry Creek N. Dr., Suite 900
Denver, Colorado 80209
(303) 320-6100

Attorneys for GREATER METRO TELECOMMUNICATIONS CONSORTIUM

Geoffrey T. Wilson, Esq.
General Counsel
Colorado Municipal League
1144 Sherman Street
Denver, Colorado 80203
(303) 831-6411

Attorney for COLORADO MUNICIPAL LEAGUE

Debra Geibig, Esq.
Anderson, Dude & Lebel, P.C.
104 S. Cascade Ave., #204
Colorado Springs, CO 80903
(719) 632-3545

Attorneys for COLORADO SPRINGS UTILITIES and Special Counsel for the CITY OF COLORADO SPRINGS

Kenneth S. Fellman, Esq.
Kissinger & Fellman, P.C.
3773 Cherry Creek N. Dr., Suite 900
Denver, Colorado 80209
(303) 320-6100

Attorneys for GREATER METRO TELECOMMUNICATIONS CONSORTIUM

Geoffrey K. Wilson, Esq.
General Counsel
Colorado Municipal League
1144 Sherman Street
Denver, Colorado 80203
(303) 831-6411

Attorney for COLORADO MUNICIPAL LEAGUE

Debra Geibig, Esq.
Anderson, Dude & Lebel, P.C.
104 S. Cascade Ave., #204
Colorado Springs, CO 80903
(719) 632-3545

Attorneys for COLORADO SPRINGS UTILITIES and Special Counsel for the CITY OF COLORADO SPRINGS

Kenneth S. Fellman, Esq.
Kissinger & Fellman, P.C.
3773 Cherry Creek N. Dr., Suite 900
Denver, Colorado 80209
(303) 320-6100

Attorneys for GREATER METRO TELECOMMUNICATIONS CONSORTIUM

Geoffrey T. Wilson, Esq.
General Counsel
Colorado Municipal League
1144 Sherman Street
Denver, Colorado 80203
(303) 831-6411

Attorney for COLORADO MUNICIPAL LEAGUE

Debra Geibig, Esq.
Anderson, Dude & Lebel, P.C.
104 S. Cascade Ave., #204
Colorado Springs, CO 80903
(719) 632-3545

Attorneys for COLORADO SPRINGS UTILITIES and Special Counsel for the CITY OF COLORADO SPRINGS

CERTIFICATE OF SERVICE

I, Elizabeth Jackson, a legal assistant at the law firm of Kissinger & Fellman, P.C., hereby certify that on this 11th day of October, 1999, I sent by first class mail, postage prepaid, a copy of the foregoing comments to the persons listed below.

The Honorable William Kennard, Chairman
Federal Communications Commission
The Portals
445 12th Street, S.W.
Suite 8-B201
Washington, D.C. 20554

The Honorable Harold Furchtgott-Roth, Commissioner
The Portals
445 12th Street, S.W.
Suite 8-B201
Washington, D.C. 20554

The Honorable Michael Powell, Commissioner
The Portals
445 12th Street, S.W.
Suite 8-B201
Washington, D.C. 20554

The Honorable Gloria Tristani, Commissioner
The Portals
445 12th Street, S.W.
Suite 8-B201
Washington, D.C. 20554

The Honorable Susan Ness, Commissioner
The Portals
445 12th Street, S.W.
Suite 8-B201
Washington, D.C. 20554

Legal Assistant

EXHIBIT A

GREATER METRO TELECOMMUNICATIONS CONSORTIUM

HOME

Membership Directory

Revised 7-8-99

GMTC Officers

Kelli Narde, President	**City of Littleton**
Dean Smits, Vice President	**City and County of Denver**
Bud Chandler, Treasurer	**Adams County**
Celeste Flores, Secretary	**City of Northglenn**
Joni Inman, Past President	**City of Lakewood**

Member Communities:

Adams County
Arapahoe County
Arvada
Aurora
Brighton
Castle Rock
Cherry Hills Village
Commerce City
Denver
Douglas County
Edgewater
Englewood
Glendale
Golden
Greenwood Village
Idaho Springs
Lafayette
Lakewood
Littleton
Northglenn
Parker
Sheridan
Thornton
Westminster
Wheat Ridge

This information is provided as a resource and for administrative purposes only. It is not intended for use by solicitors.

*** DIRECTOR**

+ ALTERNATE

ADAMS COUNTY

Bud Chandler*, GMTC Treasurer
E-mail: bchandler@co.adams.co.us
450 S. 4th Street
Brighton, CO 80601
303-654-6067 FAX 303-654-6150
Jim Hayes+
E-mail: jhayes@co.adams.co.us
4955 East 74th Avenue
Commerce City, CO 80222
303-853-7006 FAX 303-853-7015

ARAPAHOE COUNTY

Shannon Carter*
E-mail: issue14@aol.com
Jay Williams+
Rita Pollock+
5334 South Prince Street
Littleton, CO 80166
303-795-4460 FAX 303-738-7899

CITY OF ARVADA

Paul Thurston*
E-mail: paul@ci.arvada.co.us
8101 Ralston Road
Arvada, CO 80001-8101
303-431-3091 FAX 303-431-3085
Chris Daly+
E-mail: chris-d@ci.arvada.co.us
8101 Ralston Road
Arvada, CO 80001-8101
303-431-3007 FAX 303-431-3085

CITY OF AURORA

Joe LaRocco*
Email: jlarocco@ci.aurora.co.us
303-739-6588 FAX 303-739-6582
Glenda Dominguez+
E-mail: gdominque@ci.aurora.co.us
14949 East Alameda Drive
303-739-7030 FAX 303-739-7042
Aurora, CO 80012
Kristie Denbrock-Porter+
E-mail: kporter@ci.aurora.co.us
1470 S Havana #800
Aurora, CO 80012
303-739-7008 Fax 303-739-7123

CITY OF BRIGHTON

Fritz Sprague*
303-655-2050 FAX 303-655-2152
Sue Corbett+
22 South 4th Avenue
Brighton, Colorado 80601
303-655-2076 FAX 303-655-2047

TOWN OF CASTLE ROCK

Susan Casey*
E-mail: casey@ci.castlerock.co.us
680 North Wilcox
Castle Rock, CO 80104
303-660-1015 FAX 303-660-1024
Deanne Durfee+
E-mail: deanne@ci.castlerock.co.us
303-660-1015 FAX 303-660-1028

CITY OF CHERRY HILLS VILLAGE

Kevin Louis*
303-783-2731 FAX 303-761-9386
Cheryl Bohn+
2450 East Quincy Avenue
Cherry Hills Village, CO 80110
303-789-2541 x3022

CITY OF COMMERCE CITY

Trish Layton*
5291 East 60th Avenue
Commerce City, CO 80022
303-289-3717 FAX 303-289-3688

Jason Melfi+
5291 East 60th Avenue
Commerce City, CO 80022
303-289-3612 FAX 303-289-3688

Greg Caton+
5291 East 60th Avenue
Commerce City, CO 80022
303-289-3784 FAX 303-289-3688

CITY OF DENVER

Dean Smits*, GMTC Vice President
E-mail: smitsd@ci.denver.co.us
303 W. Colfax Ave. #850
Denver, CO 80204
303-640-2845 FAX 303-640-3888
Darryn Zuehlke+
E-mail: zuehlkd@ci.denver.co.us
303-640-4477 FAX: 303-640-3888
303 W. Colfax Ave. #850
Denver, CO 80204
Byron West+
E-mail: bwest@ci.denver.co.us
2390 Syracuse St. Ste. 100
Denver, CO 80207
303-394-5800 FAX 303-394-5801

DOUGLAS COUNTY

Gary Copp*
E-mail: gcopp@douglas.co.us
303-660-7454 FAX:688-6908
Kristin French+
303-660-7449 FAX:303-688-1293
Jess Stainbrook+
100 3rd Street
Castle Rock, CO 80104
303-660-7301 FAX 303-663-2425

CITY OF EDGEWATER

Mayor John Fox*
Kathleen Kelly+
2401 Sheridan Blvd
Edgewater, CO 80214
303-238-7803 x21 FAX 303-238-7192

CITY OF ENGLEWOOD

Leigh Ann Hoffhines*
E-mail:lhoffhines@ci.englewood.co.us
3400 South Elati
Englewood, CO 80110
303-762-2316 FAX 303-783-6855

CITY OF GLENDALE

Theresa Teeters*
950 South Birch
Glendale, CO 80246
303-759-1513 FAX 303-759-0561

CITY OF GOLDEN

Tami Johnson*
Tom Young, Volunteer
Jim Windholz+, City Attorney
911 10th Street
Golden, CO 80401
303-384-8091 FAX 303-384-8089

CITY OF GREENWOOD VILLAGE

Melissa Garcia*
E-mail: mgarcia@greenwoodvillage.com
6060 South Quebec Street
Greenwood Village, CO 80111
303-486-5749 FAX 303-486-1558

CITY OF IDAHO SPRINGS

Mayor Bill Macey*
Jack Russelessi, City Manager
P.O. Box 907
Idaho Springs, CO 80452
303-657-4421 FAX 303-567-4951

CITY OF LAFAYETTE

Susan Koster*
1290 South Public Road
Lafayette, CO 80026
303-665-5588 FAX 303-665-2153

CITY OF LAKEWOOD

Joni Inman*, GMTC Past President
E-mail: jdinman@lakewood.org
Kathie Beard+
Chris Curtis+
445 South Allison Parkway
Lakewood, CO 80226-3105
303-987-7050 FAX 303-987-7063

CITY OF LITTLETON

Kelli Narde*, GMTC President
2255 West Berry Avenue
Littleton, CO 80165
303-795-3733 FAX 303-795-3818

CITY OF NORTHGLENN

Celeste Flores*, GMTC Secretary

TOWN OF PARKER

Jeannene Bybee*

303-450-8751
Mary Harris+
11701 Community Center Drive
Northglenn, CO 80233
303-450-8770 FAX 303-450-8708

Carol Baumbartner+
20120 East Main Street
Parker, CO 80134
303-841-0353 FAX 303-840-9792

CITY OF SHERIDAN

Patrick Goff*
4101 South Federal
Sheridan, CO 80110
303-762-2200 FAX 303-788-1853

CITY OF THORNTON

Jan Dexter-Blunt*
Joyce Hunt+
9500 Civic Center
Thornton, CO 80229
303-538-7226 FAX 303-538-7686

CITY OF WESTMINSTER

Gary Casner*
E-mail: gcasner@ci.westminster.co.us
303-430-2400 ext. 2020 FAX 303-657-6098
Nicole Jenkins+
E-mail: njenkins@ci.westminster.co.us
4800 West 92nd Avenue
Westminster, CO 80030
303-430-2400 x2008 FAX 303-430-1809

CITY OF WHEAT RIDGE

Patricia Crew*
7500 West 29th Avenue
Wheat Ridge, CO 80215
303-235-2812 FAX 303-234-5924

GMTC ATTORNEY

Kenneth S. Fellman
E-mail: kfellman@kandf.com
Kissinger & Fellman, P.C.
Attorneys at Law
Ptarmigan Pl., Ste. 900
3773 Cherry Creek North Dr
Denver, CO 80209
303-320-6100 FAX 303-320-6613

GMTC ADMINISTRATIVE CLERK

Jessica Bone

PEG COMMITTEE CHAIRMAN

Alan DeLollis

E-mail: jbone@ci.aurora.co.us
Aurora Central Library
14949 East Alameda Drive
Aurora, CO 80012
303-739-6577 FAX 303-739-6586

Email: adelollis@ci.denver.co.us
2390 Syracuse St., Ste. 100
Denver, CO 80207-3650
303-394-5808 FAX 303-394-5804

Bylaws

Sample Intergovernmental Agreement

EXHIBIT B